

SEALED

FILED IN OPEN COURT  
ON 8-1-18 BC  
Peter A. Moore, Jr., Clerk  
US District Court  
Eastern District of NC

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION

NO. 7:18-cr-131-130(1)

UNITED STATES OF AMERICA )

v. )

KAORU SAULS )

a/k/a "Kaoru Wada" )

I N D I C T M E N T

The Grand Jury charges that:

COUNT ONE

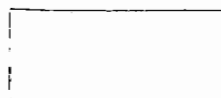
On or about November 4, 2016, in the Eastern District of North Carolina, the defendant, KAORU SAULS, also known as "Kaoru Wada," did knowingly make a false statement and claim that she was a citizen of the United States in order to register to vote, in violation of Title 18, United States Code, Section 1015(f).

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COUNT TWO

On or about November 8, 2016, in the Eastern District of North Carolina, the defendant, KAORU SAULS, also known as "Kaoru Wada," an alien, knowing she was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

A TRUE BILL



FOREPERSON

**REDACTED VERSION**

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

7-31-18

DATE

ROBERT J. HIGDON, JR.  
United States Attorney

Sebastian Kielmanovich

BY: SEBASTIAN KIELMANOVICH  
Assistant United States Attorney